



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

DEPARTMENT OF ENVIRONMENTAL
EMERGENCY RESPONSE & RESTORATION

93 JUL -6 PM 2:11

RECEIVED

REPLY TO THE ATTENTION OF:

SP-14J

JUN 29 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James R. Conway, President
Marion Steel Company
912 Cheney Avenue
Marion, Ohio 43302

Re: PCB Spill

Dear Mr. Conway:

This letter pertains to the PCB spill at your facility documented during an inspection on July 7, 1989 by the Ohio Environmental Protection Agency (OEPA).

During the inspection, a sample was collected by the inspector from an oily area beneath the south capacitor bank in the main substation. Results of analyses showed the sample contained 86,000 ppm PCBs. In a letter dated July 21, 1989 from OEPA, Marion Steel was advised of these results and instructed to clean the soil to 25 ppm PCBs and clean any affected solid surfaces to 100 ug/100 cm². Marion Steel was also forwarded a copy of the National Spill Response Policy and advised to document the cleanup as required by the policy.

In a letter dated July 26, 1989 to OEPA, Marion Steel stated that the cleanup was completed. Marion Steel stated further that to confirm PCBs were totally removed, two samples of soil in the cleanup area would be sent out for testing. On August 8, 1989 Marion Steel reported the results of analyses on these two samples to be 1360 ppm and 4500 ppm PCBs. However, Marion Steel felt these results were questionable because of the type of Aroclor identified.

On August 31, 1989 representatives from OEPA returned to Marion Steel and collected a soil sample from the cleanup area. The results of analyses on this sample showed 210 ppm PCBs. These results were forwarded to Marion Steel with instructions to remove additional soil.

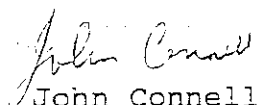
On November 30 and December 1, 1992, OEPA representatives returned to reinspect Marion Steel. At that time, Marion Steel could not produce documentation to show that additional soil had been removed from the spill site or that the soil had been cleaned to 25 ppm as required. Marion Steel did supply OEPA with a manifest (0570 M dated August 1, 1989) for the two drums of initially removed soil. When asked if additional soil was removed, Marion Steel did not know and did not have follow-up sample results to document cleanup to the required level. When asked if a manifest existed for additional drums of cleanup soil, Marion Steel indicated that manifest number AT15M dated April 4, 1991 contained debris from the cleanup. However, manifest AT15M indicates that 15 drums of capacitors and four drums of solids (clothing) were disposed. The continuation sheet to the manifest, certified by Marion Steel personnel, indicates the drums contained capacitors.

At this date, neither the Ohio Environmental Protection Agency nor the U.S. Environmental Protection Agency has received documentation from Marion Steel Company showing that the PCB spill discovered during the July 7, 1989 inspection has been cleaned up to 25 ppm PCBs as required. Failure to clean up this spill would constitute improper disposal in violation of the PCB regulations at 40 C.F.R. § 761.60.

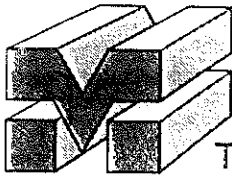
Please submit, within 20 days, documentation that 1) the spill has been properly cleaned up, or 2) an explanation of Marion Steel's position in this matter. Please respond directly to John Love, PCB Control Section. If you have any questions about this letter, please call Mr. Love at (312) 886-6845.

Thank you for your cooperation.

Sincerely,



John Connell, Chief
PCB Control Section



THE MARION STEEL COMPANY

912 CHENEY AVENUE

MARION, OHIO 43302

614-383-4011
FAX: 614-383-6429

RECEIVED

July 7, 1993

Ms. Charlotte Hammar
Division of Emergency and Remedial Response
Ohio Environmental Protection Agency
P. O. Box 1049
1800 WaterMark Drive
Columbus, Ohio 43266-0149

Re: Follow up sampling from previous PCB Fluid
Spill in the Plant Main Substation

Dear Mrs. Hammar:

We apologize for the misunderstanding which took place involving the post sampling of the July 1989 remediation project. As discussed in our December meeting, we were under the impression from EPA inspector Kelly Sherman that our results were satisfactory to the E.P.A.

Additionally, in January 1993 we re-initiated a complete sampling plan and discovered a presence of PCB contamination in the area below the capacitor bank greater than 25 ppm. Another remediation plan was implemented on June 24 of 1993 by Cousins Environmental Services. We believe that this clean up effort rendered the affected area completely free from PCB contamination.

Please find the enclosed amended Clean up Document and attached Cousins report involving this incident.

Please don't hesitate to call if you have any question or concerns about this information or if you wish to schedule a follow up visit to resample the area in question.

Sincerely,


Scott D. Conway
Plant Manager

MARION STEEL COMPANY
912 CHENEY AVENUE
MARION, OHIO 43302

December 15, 1992
EPA ID NO. OH D032271475

PCB SPILL CLEAN UP DOCUMENTATION, Report Amended June 28, 1993

CRF 761.125(c) (5) RECORDS

5(i) IDENTIFICATION OF SOURCE OF SPILL:

3-Ruptured Westinghouse 200 var PCB capacitors containing inerteen. This spill was discovered by EPA inspectors on 7/7/89.

5(ii) Estimated date of spill:

8/3/83

5(iii) Completed date of clean up:

8/1/89, Second remediation 6/24/93

5(iv),(v) Description of spill:

The spill was located in the main electrical substation below the south bank of capacitors. The gravel and soil directly beneath the bank were saturated in approximately a 2 foot diameter circle. The spill was plainly visible and apparently localized to this circle.

* See attached pre-clean up sampling data.

Resampling in February 1993 indicated PCB contamination greater than 25 ppm. It was evident that the 1989 cleanup may not have been complete.

Cousins Environmental Services was contracted to re-establish the area of contamination. The results indicated that there was still spotted saturated soil directly beneath the capacitor bank. (Please see attached Cousins report).

5(vi) N/A

5(vii) Depth and quantity of soil removed:

There were 2 separate clean up efforts initiated for this discovered spill. The first clean up resulted in approximately 1-55 gallon drum of soil and gravel being removed from the area. Post clean up sampling still indicated the presence of PCBs. Additional clean up was recommended by the EPA inspectors, subsequently, a second 55-gallon drum of soil was removed from the area.

Total Depth -	approximately 2 - 3 feet
Total Quantity -	2-55 gallon drums
Total Weight -	1,208 lbs.

The second remediation effort was performed by Cousins on June 24, 1993. An area of 7'6" x 7'6" was excavated around the capacitor bank. The depth was approximately 1 foot of soil to a slab or footer of concrete which is in place to support the capacitor bank. Apparently the information on the initial cleanup depth of 2-3 feet is inaccurate. The clean up generated approximately 6 - 55 gallon drums of soil and a total weight of approximately 2,500 lbs. - Please see attached Cousins report.

5(viii) Post clean up verification data:

** See attached post clean up data.

*** Please see attached Cousins report.

5(ix) Estimated cost of clean up:

Man hours - 10 @ \$15/hr.	= \$ 150
Disposal - actual amt.	= \$ 2,100
Total	= \$ 2,250

Second cleanup:

Cousins Environmental Services	\$ 5,000
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WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : OHIO EPA-DIV OF EMERGENCY RESPONSE
LAB #: 6810-23802
MATRIX: SOLID

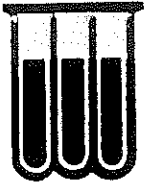
DATE RECEIVED: 7/10/89
DATE EXTRACTED: 7/10/89
DATE ANALYZED: 7/13/89

SAMPLE ID: MAIN SUBSTATION OIL STAINED AREA UNDER CAPACITOR BANK

POLYCHLORINATED BIPHENYLS
METHOD 8080 LIST - GC

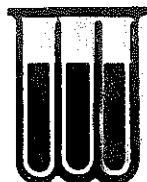
PCB-1016	86,000
PCB-1221	ND
PCB-1232	ND
PCB-1242	ND
PCB-1248	ND
PCB-1254	ND
PCB-1260	ND
PCB-1262	--

NOTE: ND (None Detected, lower detectable limit = 39,000 mg/kg) as rec'
ND# (None Detected, lower detectable limit = mg/kg) as rec'
-- (Not Analyzed)



WADSWORTH/ALERT
LABORATORIES, INC.

QUALITY CONTROL SECTION



WADSWORTH/ALERT
LABORATORIES, INC.

MATRIX SPIKE DATA

LAB ID	PARAMETER	SPIKE PERCENT RECOVERY	SPK/DUP PERCENT RECOVERY	SPIKE MATRIX	QC CONTRC LIMITS
890710	Polychlorinated Biphenyls	94	95	SOLID	(46-12



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : Wadsworth/Alert Laboratories
LAB #: 9289-92710
MATRIX: SOLID

DATE RECEIVED: 7/10/89
DATE EXTRACTED: 7/10/89
DATE ANALYZED: 7/12/89

SAMPLE ID: INTRA-LAB BLANK , 7 /10/89

POLYCHLORINATED BIPHENYLS
ANALYTICAL BLANK REPORT

PCB-1016	ND
PCB-1221	ND
PCB-1232	ND
PCB-1242	ND
PCB-1248	ND
PCB-1254	ND
PCB-1260	ND
PCB-1262	--

NOTE: ND (None Detected, lower detectable limit = 1 mg/kg) as rec'd
ND# (None Detected, lower detectable limit = mg/kg) as rec'd
-- (Not Analyzed)



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : Wadsworth/Alert Laboratories
LAB #: 9289-92711
MATRIX: SOLID

DATE RECEIVED: 7/11/89
DATE EXTRACTED: 7/11/89
DATE ANALYZED: 7/13/89

SAMPLE ID: INTRA-LAB BLANK , 7 /11/89

POLYCHLORINATED BIPHENYLS
ANALYTICAL BLANK REPORT

PCB-1016	ND
PCB-1221	ND
PCB-1232	ND

PCB-1242	ND
PCB-1248	ND
PCB-1254	ND

PCB-1260	ND
PCB-1262	--

NOTE: ND (None Detected, lower detectable limit = 1 mg/kg) as rec'd
ND= (None Detected, lower detectable limit = 1 mg/kg) as rec'd
-- (Not Analyzed)

AQUA TECH ENVIRONMENTAL CONSULTANTS, INC.

P.O. Box 76
Melmore, Ohio 44845
(419) 397-2659

Client: MARION STEEL COMPANY	
Address: 912 CHENEY AVENUE MARION, OH 43302 ATTN: SCOTT CONWAY	
Project No:	Date(s) of Receipt at Laboratory:
Purchase Order:	JULY 27, 1989
Comments:	

Sample Inventory		
Atec No.	Client No.	Method(s)
7671	MS-1 CENTER	8080
7672	MS-2 EAST	8080

Comments: SENT RESULTS TO FAX # 614-383-6429 ON 3/11/89

Authorized Signature: *Robert S. Ramsey*

For: Melmore Laboratory Manager

Date: AUGUST 1, 1989

Marion Steel Co.
Polychlorinated Biphenyl (PCB) Analysis
Method Number 8080
Date Received: July 27, 1989

Atec Lab No.	7671	7672
Client Sample No.	MS-1 Center	MS-2 East
Analyst	CMR	CMR
Date Analyzed	8/11/89	8/11/89
Aroclor 1016	< 10.0	< 10.0
Aroclor 1221	< 10.0	< 10.0
Aroclor 1232	< 10.0	< 10.0
Aroclor 1242	1360	4500
Aroclor 1248	< 10.0	< 10.0
Aroclor 1254	< 10.0	< 10.0
Aroclor 1260	< 10.0	< 10.0

All results are reported as mg/kg dry weight.



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : OHIO EPA-DIV OF EMERGENCY RESPONSE
LAB #: 1535-30024
MATRIX: SOLID

DATE RECEIVED: 9/ 5/89
DATE EXTRACTED: 9/ 6/89
DATE ANALYZED: 9/13/89

SAMPLE ID: 01 MAIN SUBSTATION: AREA BELOW S. CAPACITOR BANK 8-31-89 1120

POLYCHLORINATED BIPHENYLS
METHOD 8080 LIST - GC

PCB-1016	210
PCB-1221	ND
PCB-1232	ND
PCB-1242	ND
PCB-1248	ND
PCB-1254	ND
PCB-1260	ND
PCB-1262	--

NOTE: ND (None Detected, lower detectable limit = 70
ND* (None Detected, lower detectable limit =
-- (Not Analyzed)

mg/kg) as rec'd
ng/kg) as rec'd



Waste Control • Environmental Services • Dust Control
PROVIDING QUALITY SERVICES SINCE 1971

1801 Matzinger Road
Toledo, Ohio 43612
(419) 726-1500 • (800) 433-6754

SALES FAX:
(419) 729-8501

MAIN FAX:
(419) 729-8507

ENVIRONMENTAL FAX:
(419) 729-8506

June 25, 1993

Mr. Scott Conway
Marion Steel Company
912 Cheney Ave.
Marion, Ohio 43302

Re: Remediation of PCB spill area.

Dear Mr. Conway:

On May 4, 1993, Cousins personnel arrived at the spill site for the specific purpose of collecting samples to quantify the extent of the contamination caused by the spill. This spill occurred underneath a small capacitor bank within the plant substation. The area under the capacitor bank was sectioned off for the purpose of establishing a sampling grid. A schematic of the spill area and the collection points of the samples is attached in Appendix A. Samples were taken at the corners of the four boxes at depth intervals of surface, one foot, and two foot. A sample was taken directly beneath the capacitor bank at the depth of one foot. The capacitor bank supports are resting on a concrete slab at a depth of one foot below the surface. The slab is represented in the schematic as the dotted line.

The results of the analysis are enclosed in Appendix B. From the results of the analysis the area to be remediated was determined. On June 24, 1993, Cousins personnel returned to the site to complete the remediation. The remediation consisted of excavating the contaminated soils beneath the capacitor bank from the surface to the top of the concrete support slab. The extent of the excavation is shown in the schematic in Appendix A. After the excavation, the slab was inspected for the presence of cracks. This inspection revealed that the slab did not have any cracks, thus there is no reason to believe that the contamination went any further. The excavation generated six drums of PCB contaminated waste which were properly labeled and staged for disposal. The maintenance staff at the site provided the clean backfill for the excavation.

Thank you for allowing us to serve your company by completing this spill cleanup. Please contact me if Cousins can be of any further assistance with your environmental needs.

Respectfully,

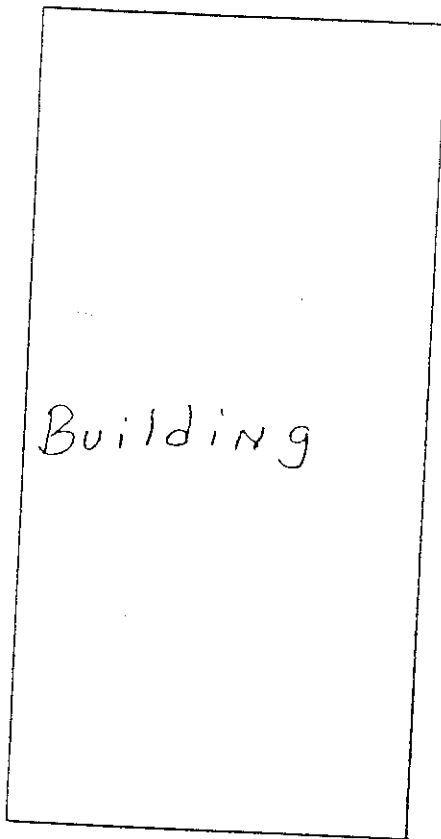
Bruce W. Hartzell
Project Manager

APPENDIX A

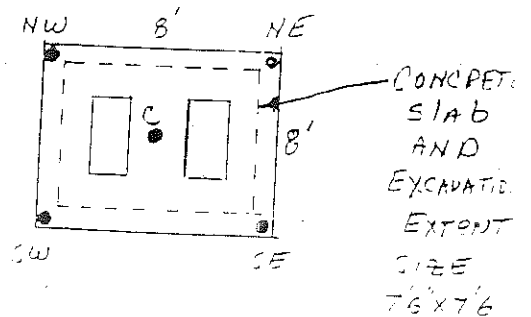


C
H
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A
V
E.



PLANT SUBSTATION AREA



• = sampling points

APPENDIX B



47930 West Road • Wixom, Michigan 48393
Phone: (313) 624-3090 • Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03783

Sample Description: C-S1 SURF, Marion Steel, Marion, Ohio

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Anal
PCB Analysis							
ARO 1016	1400	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI

Reviewed by

Date

5/17/93



47930 West Road • Wixom, Michigan 48393
Phone: (313) 624-3090 • Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03784

Sample Description: Marion Steel, Marion, Ohio SE2-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analv
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/16/93	NMI
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/16/93	NMI
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/16/93	NMI
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/16/93	NMI
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/16/93	NMI
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/16/93	NMI
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/16/93	NMI

Reviewed by

Date

5/17/93



47930 West Road • Wixom, Michigan 48393
Phone: (313) 624-3090 • Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03785

Sample Description: Marion Steel, Marion, Ohio SE1-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analys
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NNB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NNB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NNB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NNB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NNB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NNB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NNB

Reviewed by

Date

5/17/93



47930 West Road • Wixom, Michigan 48393
Phone: (313) 624-3090 • Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03786

Sample Description: Marion Steel, Marion, Ohio SE5-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analy
PCB Analysis							
ARO 1016	0.42	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NME

Reviewed by

Date

5/17/93



47930 West Road • Wixom, Michigan 48393
Phone: (313) 624-3090 • Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03787

Sample Description: Marion Steel, Marion, Ohio SW5-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Ana
PCB Analysis							
ARO 1016	0.57	mg/L		0.33	SW846 8080	05/14/93	NM
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NM
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NM
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NM
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NM
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NM
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NM

Reviewed by

Date

5/17/93



47930 West Road • Wixom, Michigan 48393
Phone: (313) 624-3090 • Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03788

Sample Description: Marion Steel, Marion, Ohio SW1-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analy
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NME

Reviewed by

Date

5/17/93



47930 West Road • Wixom, Michigan 48393
Phone: (313) 624-3090 • Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03789

Sample Description: Marion Steel, Marion, Ohio SW2-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analy
PCB Analysis							
ARO 1016	Not det	mg/L		1.0	SW846 8080	05/14/93	NME
ARO 1221	Not det	mg/L		1.0	SW846 8080	05/14/93	NME
ARO 1232	Not det	mg/L		1.0	SW846 8080	05/14/93	NME
ARO 1242	Not det	mg/L		1.0	SW846 8080	05/14/93	NME
ARO 1248	Not det	mg/L		1.0	SW846 8080	05/14/93	NME
ARO 1254	Not det	mg/L		1.0	SW846 8080	05/14/93	NME
ARO 1260	Not det	mg/L		1.0	SW846 8080	05/14/93	NME

Reviewed by

Date

5/17/93



47930 West Road • Wixom, Michigan 48393
Phone: (313) 624-3090 • Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03790

Sample Description: Marion Steel, Marion, Ohio NE2-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Anal
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NME

Reviewed by

Date

5/17/93



47930 West Road • Wixom, Michigan 48393
Phone: (313) 624-3090 • Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03789

Sample Description: Marion Steel, Marion, Ohio SW2-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analy
PCB Analysis							
ARO 1016	Not det	mg/L		1.0	SW846 8080	05/14/93	NME
ARO 1221	Not det	mg/L		1.0	SW846 8080	05/14/93	NME
ARO 1232	Not det	mg/L		1.0	SW846 8080	05/14/93	NME
ARO 1242	Not det	mg/L		1.0	SW846 8080	05/14/93	NME
ARO 1248	Not det	mg/L		1.0	SW846 8080	05/14/93	NME
ARO 1254	Not det	mg/L		1.0	SW846 8080	05/14/93	NME
ARO 1260	Not det	mg/L		1.0	SW846 8080	05/14/93	NME

Reviewed by

Date

5/17/93



47930 West Road • Wixom, Michigan 48393
Phone: (313) 624-3090 • Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Eagle Report Number: 1281

Eagle Sample ID: EL03790

Date: 05/17/93

Sample Description: Marion Steel, Marion, Ohio NE2-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analysis
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI

Reviewed by

Date

5/17/93



47930 West Road • Wixom, Michigan 48393
Phone: (313) 624-3090 • Fax: (313) 624-3095

To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03791

Sample Description: Marion Steel, Marion, Ohio NE1-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Anal
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NME

Reviewed by

Date

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To: COUSINS ENVIRONMENTAL SERVICES
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Toledo, OH 43612

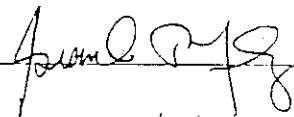
Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03792

Sample Description: Marion Steel, Marion, Ohio NE5-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Anal
PCB Analysis							
ARO 1016	0.50	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMI

Reviewed by



Date

5/17/93



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To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03793

Sample Description: Marion Steel, Marion, Ohio NW2-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analysis
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB

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Date

5/17/93



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To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Eagle Report Number: 1281

Eagle Sample ID: EL03794

Date: 05/17/93

Sample Description: Marion Steel, Marion, Ohio NW1-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analys
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB

Reviewed by

Date

5/17/93



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To: COUSINS ENVIRONMENTAL SERVICES
1801 Matzinger Road
Toledo, OH 43612

Date: 05/17/93

Eagle Report Number: 1281
Eagle Sample ID: EL03795

Sample Description: Marion Steel, Marion, Ohio NW5-1

Parameters	Results	Units	Reg Level	MDL	Method	Analysis Date	Analysis
PCB Analysis							
ARO 1016	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1221	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1232	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1242	Not det	mg/L		0.33	SW846 8080	05/14/93	NME
ARO 1248	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1254	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB
ARO 1260	Not det	mg/L		0.33	SW846 8080	05/14/93	NMB

Reviewed by

Date

5/17/93